

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Case No. 19-cr-582 (DRH)

v.

FRANCES CABASSO, et al.,

**DECLARATION OF  
BRYAN HA**

Defendants.  
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I, BRYAN HA, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney admitted to practice in the State of New York and a member of the bar of this Court. I am of counsel to the Law Offices of Kenneth J. Kapan, P.C., which represents defendant Frances Cabasso in the above-captioned matter.

2. Annexed hereto as Exhibit A is a true and correct copy of a blog post entitled “How Fast Does The Average Boat Depreciate?” published on the TheMariner.com website on May 21, 2020 (<https://themariner.com/blog/boat-depreciation/>).

3. Annexed hereto as Exhibit B is a true and correct copy of an article entitled “Total cost of ownership in luxury yacht buying” published on the World Yacht Group website on April 24, 2020 (<https://worldyachtgroup.com/luxury-yacht-sales-top-5-financial-questions-you-should-ask-when-buying-a-luxury-yacht/>).

4. Annexed hereto as Exhibit C are true and correct copies of current sales listings of Azimut Model 68S yachts from model years 2005-2007.

5. Annexed hereto as Exhibit D is a true and correct copy of an e-mail from Rob Becker, Office Manager/Purchasing Agent for Campbell’s Boatyards, with a service rates sheet attached, sent on February 8, 2021.

6. Annexed hereto as Exhibit E is a true and correct copy of an e-mail from Abell Custom Marine LLC sent on February 8, 2021.

Dated: Westchester County, New York  
February 15, 2021

/s/ Bryan Ha  
BRYAN HA